

# **EXHIBIT 5**

9/10/2024

VirtaMove Corp. v. Amazon.com, Inc., et al.

Donn Rochette

Page 1	
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND/ODESSA DIVISION	
VIRTAMOVE, CORP.,	)
	) CASE NO.
PLAINTIFF,	) 7:24-CV-00030
	)
v.	)
	)
AMAZON.COM, INC.; AMAZON.COM	)
SERVICES LLC; AND AMAZON WEB	)
SERVICES, INC.,	)
	)
DEFENDANTS.	)
	)
VIDEOTAPED DEPOSITION OF DONN ROCHETTE TAKEN REMOTELY VIA ZOOM VIDEOCONFERENCE TUESDAY, SEPTEMBER 10, 2024 11:04 A.M. CDT	
REPORTED BY AUDRA E. CRAMER, CSR NO. 9901	
DIGITAL EVIDENCE GROUP 1730 M Street, NW, Suite 812 Washington, D.C. 20036 (202) 232-0646	

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1	VIDEOTAPED DEPOSITION OF DONN ROCHETTE,
2	TAKEN REMOTELY VIA ZOOM ON BEHALF OF THE DEFENDANTS
3	AT 11:04 A.M. CDT, TUESDAY, SEPTEMBER 10, 2024, BEFORE
4	AUDRA E. CRAMER, CSR NO. 9901, PURSUANT TO SUBPOENA.
5	
6	APPEARANCES OF COUNSEL
7	
8	ON BEHALF OF THE PLAINTIFF:
9	
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	ALSO PRESENT
	BILLY FAHNERT, VIDEOGRAPHER

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2	EXAMINATION PAGE
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6	BY MR. TONG 155
7	
8	E X H I B I T S
9	NO. PAGE DESCRIPTION
10	1010 14 US PATENT 7,519,814
11	1009 18 ARCHIVE VERSION OF THE
12	HOME PAGE ONCORE SYSTEMS
13	CORPORATION
14	1011 24 US PATENT 7,784,058
15	1012 42 AUSTRALIAN UNIX SYSTEMS
16	USER GROUP NEWSLETTER,
17	VOLUME 8, NUMBER 5
18	QUESTIONS INSTRUCTED BY COUNSEL NOT TO ANSWER
	PAGE LINE
19	144 7
	145 2
20	REPORTER'S NOTE: All quotations from exhibits are
	reflected in the manner in which they were read into the
21	record and do not necessarily indicate an exact quote
22	from the document.

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1	REMOVED VIA ZOOM VIDEOCONFERENCE
2	TUESDAY, SEPTEMBER 10, 2024, 11:04 A.M. CDT
3	
4	THE VIDEOGRAPHER: We are on the
5	record. This is the remote video deposition of
6	Donn Rochette in the matter of VirtaMove Corp.
7	versus Amazon.com, Inc., et al., filed in the
8	United States District Court for the Western
9	District of Texas.
10	My name is Billy Fahner. I am the
11	video technician today. The court reporter is
12	Audra Cramer. We both represent Digital
13	Evidence Group.
14	Today's date is September 10, 2024.
15	The time is 11:04 a.m. Central Standard Time.
16	All parties have stipulated to the
17	witness being sworn in remotely.
18	Will Counsel please identify yourselves
19	for the record, and then the witness will be
20	sworn in.
21	MR. TONG: This is Peter Tong from Russ
22	August & Kabat on behalf of VirtaMove

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1 Corporation?  
 2 MR. ANAPOL: Jeremy Anapol of Knobbe  
 3 Martens Olson & Bear on behalf of Defendants.

4  
 5 DONN ROCHETTE,  
 6 having been first duly sworn, was  
 7 examined and testified as follows:

8  
 9 MR. ANAPOL: Thank you.

10  
 11 EXAMINATION

12 BY MR. ANAPOL:

13 Q. Mr. Rochette, thank you again for being  
 14 here today, taking time out of your schedule to  
 15 help us collect some information that we hope  
 16 will be helpful in our case.

17 Have you ever been deposed before?

18 A. No.

19 Q. Okay. So I'll cover some general  
 20 background with you just to help you understand  
 21 the process.

22 But before that, can we start by having

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1 A. Okay.

2 Q. If you don't understand one of my  
 3 questions, please ask for clarification. I'm  
 4 happy to provide it.

5 If you need to take a break at any  
 6 time, please let me know, but if there's a  
 7 question that's pending, I'll just ask that you  
 8 give the answer, and then we'll take a break  
 9 afterward.

10 A. Okay.

11 Q. Is there any reason why you cannot  
 12 provide complete and accurate testimony today  
 13 such as, you know, being on any medication or  
 14 anything like that?

15 A. No.

16 Q. And, Mr. Rochette, you used to work at  
 17 a company called Trigence Corp.; is that right?

18 A. Yes.

19 Q. And do you remember when you worked for  
 20 Trigence?

21 A. Gosh, I couldn't give you the dates off  
 22 the top of my head, no. It's been a long time.

Page 6

1 you state your full name for the record?

2 A. My name is Donn Rochette.

3 Q. And Mr. Rochette, where are you joining  
 4 us from today?

5 A. I am calling from my home in northern  
 6 Iowa.

7 Q. Okay. So the deposition is going to  
 8 follow a question-and-answer format, and Audra,  
 9 our court reporter, is going to be transcribing  
 10 the answers. Because she can only transcribe  
 11 one person speaking at a time, I'll ask that you  
 12 wait until I finish my question to start  
 13 answering, and I will try to wait until you  
 14 finish answering to ask the next question.

15 Mr. Tong, who's representing the  
 16 Plaintiffs, may have some objections which he  
 17 might chime in with, but you can go ahead and  
 18 answer the question after he finishes his  
 19 objection. Those are for the record, so, if  
 20 necessary, the judge will look at those  
 21 objections later, but you don't need to concern  
 22 yourself with those.

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1 Q. Was it in the early 2000s?

2 A. Yes.

3 Q. And did you understand that Trigence  
 4 later became AppZero?

5 A. Yes.

6 Q. And then there's a company called  
 7 AppZero Software Corp. which is now called  
 8 VirtaMove.

9 Do you understand that?

10 A. I was not aware of that, no. Not until  
 11 very recently.

12 Q. And when did you become aware of that?

13 A. Oh, about two months ago someone from  
 14 VirtaMove reached out to me over LinkedIn --

15 Q. Okay.

16 A. -- and pointed out the connection.

17 Q. Do you remember who from VirtaMove  
 18 reached out to you over LinkedIn?

19 A. The person identified himself as the  
 20 CEO of VirtaMove. I can't remember his name.  
 21 Sorry.

22 Q. Was his name Nigel Stokes?

2 (Pages 5 to 8)

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1 which it did not require internal knowledge --  
 2 it didn't require knowledge to the internals of  
 3 Solaris in order to do what we were doing. And  
 4 they -- in the end -- it was a rather lengthy  
 5 discussion. In the end they recognized what we  
 6 were doing, and we parted friends. Everything  
 7 was fine.

8 **Q. Okay. So initially Trigence AE was for**  
 9 **Linux; right?**

10 A. Correct.

11 **Q. And --**

12 A. Linux and Windows.

13 **Q. Linux and Windows?**

14 A. Yes.

15 **Q. And then Solaris support was added**  
 16 **later?**

17 A. Yes.

18 **Q. Okay. And so the meeting with Sun**  
 19 **Microsystems was after you had developed some**  
 20 **sort of Solaris capability for Trigence AE?**

21 A. I don't think it was released to the  
 22 public, but, yes, we had working versions. Yes.

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1 **Q. Okay. So what your understanding of**  
 2 **Solaris zones?**

3 A. Oh gosh. That is a lengthy answer.

4 Zones would provide a separate  
 5 container, a separate security environment for  
 6 each app and for our multiple -- and for an  
 7 application to run it. So you could define a  
 8 zone for each application you had running in  
 9 Solaris. That zone would allow the application  
 10 to have its -- potentially its own version of  
 11 files. It would -- I don't recall if it had  
 12 isolated networking, but it would provide a  
 13 secure environment, and it would provide a  
 14 separate instance of files and so forth.

15 And, it was -- if you look at it at a  
 16 very high level, it looked somewhat like what  
 17 Trigence AE was doing very differently and at  
 18 different -- very different results but  
 19 largely -- largely the same -- well -- anyway,  
 20 at the very, very highest level, objectives were  
 21 similar.

22 **Q. Okay.**

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1 A. Does that help?

2 **Q. Sure.**

3 **So what are some of the differences**  
 4 **between what Trigence AE was doing and what**  
 5 **Solaris zones was doing?**

6 A. With zones, Solaris would utilize some  
 7 operating system features to create a separate  
 8 file area. They had modified the kernel, the  
 9 internals of Solaris, to support this. It  
 10 relied on kernel internals to provide  
 11 separations between applications' end zones. It  
 12 would provide separate scheduling types of  
 13 mechanisms and so forth also implemented in the  
 14 kernel.

15 The Trigence solution made no changes  
 16 to the kernel -- or didn't require any changes  
 17 to the kernel. It was all done with what was  
 18 called function overlays, where the calls made  
 19 to shared libraries could be, essentially,  
 20 redirected to calls in the Trigence library, and  
 21 we were able to manipulate things in that way.  
 22 It had nothing to do with separate zones or

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1 kernel changes or anything. So...

2 **Q. Okay. So when you say that Solaris**  
 3 **zones was different from what Trigence was**  
 4 **doing, you were contrasting Solaris zones with**  
 5 **the Trigence product, not the patents; correct?**

6 A. Yes.

7 **Q. So can you explain these function**  
 8 **overlays to me a little bit more.**

9 A. Function overlays use an operating  
 10 system capability called library preload. In  
 11 Unix and Linux and Solaris it's called  
 12 LD\_Preload. In Windows it's called AppInit\_DLL.  
 13 And what happens is you would use LD\_Preload or  
 14 AppInit\_DLL to identify a library that you  
 15 wanted loaded with your -- with an application  
 16 as it starts. When that application starts,  
 17 there's a dynamic loader that would load the  
 18 application plus other requisite libraries.

19 And LD\_Preload/AppInit\_DLL would say in  
 20 addition to the requisite libraries, also load  
 21 this library, and load it first before any other  
 22 libraries. So that has the effect of managing

10 (Pages 37 to 40)



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1 **Q. That reminds me. One follow-up**  
 2 **question about OnCore: So was OnCore selling**  
 3 **the operating system we discussed earlier by**  
 4 **2021?**

5 A. Yes.

6 **Q. By 2002 did software developers in**  
 7 **Silicon Valley know that software could run**  
 8 **inside of containers?**

9 MR. TONG: Objection. Foundation.  
 10 Calls for speculation.

11 THE WITNESS: Yes. The use of the term  
 12 "containers" is broad, but if you allow yourself  
 13 a broad definition of "containers," the answer  
 14 is yes.

15 BY MR. ANAPOL:

16 **Q. Did software developers in Silicon**  
 17 **Valley by 2002 know that servers could host more**  
 18 **than one container?**

19 THE WITNESS: Yes.

20 MR. TONG: Same objection, belated.

21 BY MR. ANAPOL:

22 **Q. By 2002 did software developers in**

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1 BY MR. ANAPOL:

2 **Q. By 2002 did software developers in**  
 3 **Silicon Valley know that putting an application**  
 4 **in a container could prevent the application**  
 5 **from interfering with applications in another**  
 6 **container?**

7 MR. TONG: Same objections. Calls for  
 8 speculation. Foundation. Calls for a legal  
 9 conclusion. Not venue discovery.

10 THE WITNESS: Again, in the context of  
 11 Solaris zones, that would be an accurate  
 12 statement. At least in the context of Solaris  
 13 zones.

14 BY MR. ANAPOL:

15 **Q. What about in the context of OnCore**  
 16 **operating system?**

17 A. Yes.

18 MR. TONG: Same objections.

19 THE WITNESS: Well, no, not in OnCore.  
 20 In Trigen. Excuse me.

21 BY MR. ANAPOL:

22 **Q. So did the OnCore containers not**

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1 **Silicon Valley know that putting an application**  
 2 **in a container could prevent the application**  
 3 **from accessing files in another container?**

4 MR. TONG: Same objection. Calls for a  
 5 legal conclusion.

6 I'm also objecting to this whole line  
 7 of questioning again as getting into fact  
 8 discovery that Mr. Donn Rochette is not  
 9 obligated to answer during venue discovery.

10 BY MR. ANAPOL:

11 **Q. Do you need me to repeat the question,**  
 12 **Mr. Rochette?**

13 A. Yes, please.

14 **Q. Sure.**

15 **By 2002 did software developers in**  
 16 **Silicon Valley know that putting an application**  
 17 **in a container could prevent the application**  
 18 **from accessing files in another container?**

19 MR. TONG: Same objections.

20 THE WITNESS: Yes. In the context of  
 21 Solaris zones, that is a true statement.

22

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1 **confine the applications in the container?**

2 MR. TONG: Objection. Calls for legal  
 3 conclusions.

4 THE WITNESS: Yeah, it's difficult to  
 5 answer.

6 The Unix applications running with Unix  
 7 were not separated and could affect each other.  
 8 Embedded applications were separated.

9 BY MR. ANAPOL:

10 **Q. So, in other words, you could have**  
 11 **multiple applications in one container?**

12 MR. TONG: Objection. Vague.

13 THE WITNESS: In a Unix context, yes.

14 BY MR. ANAPOL:

15 **Q. And the applications running in the**  
 16 **Unix context on top of OnCore would be prevented**  
 17 **from interfering with the applications running**  
 18 **on the real-time portion of the operating**  
 19 **system; correct?**

20 A. Yes.

21 MR. TONG: Objection. Calls for a  
 22 legal conclusion.

14 (Pages 53 to 56)

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1 BY MR. ANAPOL:

2 **Q. Sorry. Can you just repeat the answer,**  
3 **Mr. Rochette.**

4 A. The answer is yes.

5 **Q. And is it also true that putting an**  
6 **application in the Unix container in the OnCore**  
7 **operating system would prevent it from**  
8 **interfering with files outside of that**  
9 **container?**

10 MR. TONG: Objection. Calls for  
11 speculation. Calls for a legal conclusion.

12 THE WITNESS: That is a true  
13 statement -- an accurate statement.

14 BY MR. ANAPOL:

15 **Q. By 2002 did software developers in**  
16 **Silicon Valley know that containers could have**  
17 **their own root file systems?**

18 MR. TONG: Objection. Calls for  
19 speculation. Leading.

20 THE WITNESS: That is an accurate  
21 statement in the context of zones and  
22 Trigen AE [garbled].

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1 (The reporter requested clarification.)

2 THE WITNESS: Sorry.

3 That is an accurate statement in the  
4 context of Solaris zones, Trigen AE at least.

5 BY MR. ANAPOL:

6 **Q. I want to clarify that because I'm**  
7 **asking about 2002.**

8 **So does that change your answer?**

9 A. Oh.

10 MR. TONG: Objection. Asked and  
11 answered. Same objection as well.

12 THE WITNESS: In answer to your  
13 question, yes. I shouldn't use examples, but,  
14 yes, people knew that that was possible.

15 BY MR. ANAPOL:

16 **Q. And are you familiar with a Unix**  
17 **command called chroot.**

18 A. Yes.

19 **Q. And did that Unix command allow a user**  
20 **to give an application its own root file system?**

21 A. Yes.

22 **Q. And do you know when chroot was**

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1 **introduced?**

2 A. It was introduced in the early Unix  
3 days before Solaris. It was introduced by the  
4 Bell Labs people when they first did Unix. It  
5 goes way back.

6 **Q. So by the 1980s at least?**

7 A. At least. Before then, yes.

8 **Q. And are you familiar with something**  
9 **called BSD jails?**

10 A. Yes. I forgot about those. Yes, I am.

11 **Q. And what was BSD jails?**

12 A. It was an open source response to the  
13 capabilities in Solaris zones. It was a way of  
14 obtaining very similar behavior exemplified by  
15 zones in an open source Unix capability that  
16 didn't require licensing yet. They're not  
17 exactly the same, but it was close enough.

18 **Q. So is BSD jails another container**  
19 **capability?**

20 A. Yes.

21 MR. TONG: Objection. Calls for legal  
22 conclusion to the previous question.

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1 BY MR. ANAPOL:

2 **Q. And do you know one way or the other if**  
3 **"BSD" stands for "Berkeley Software**  
4 **Distribution"?**

5 A. It is my understanding that that is  
6 what it stands for, yes.

7 **Q. And that's referring to the University**  
8 **of California, Berkeley, in Northern California?**

9 A. That is my understanding, yes.

10 **Q. By 2002 did software developers in**  
11 **Silicon Valley know that containers could run on**  
12 **top of a kernel that was residing outside of the**  
13 **kernel?**

14 MR. TONG: Objection. Calls for  
15 speculation. Foundation. Leading.

16 THE WITNESS: Yes.

17 MR. TONG: Calls for a legal  
18 conclusion. Sorry.

19 THE WITNESS: People understood that.

20 BY MR. ANAPOL:

21 **Q. We're almost done with this line of**  
22 **questions, just so you know, Mr. Rochette. I**

15 (Pages 57 to 60)

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1 know it's repetitive in some sense.  
 2 By 2002 did software developers in  
 3 Silicon Valley know that servers could limit the  
 4 resources used by a container?

5 MR. TONG: Objection. Calls for  
 6 speculation. Foundation. Leading.

7 THE WITNESS: Yes.

8 BY MR. ANAPOL:

9 Q. And did the OnCore operating system  
 10 have the ability to limit resources used by a  
 11 container?

12 MR. TONG: Same objections.

13 THE WITNESS: That was not the intent  
 14 of the OnCore system, no. There was no explicit  
 15 limiting of resources or -- in that -- in that  
 16 architecture.

17 BY MR. ANAPOL:

18 Q. But the OnCore system would allow a  
 19 real-time program to preempt an application  
 20 running in a Unix container; correct?

21 A. That is correct. But not for -- it  
 22 would not allow -- it would not enforce the

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1 BY MR. ANAPOL:

2 Q. And by 2002 did software developers in  
 3 Silicon Valley know that containers could have  
 4 their own IP address separate from a host?

5 MR. TONG: Same objections.

6 THE WITNESS: I'm not 100 percent sure  
 7 of that. That was very difficult -- that's very  
 8 difficult to accomplish, the IP address, and I  
 9 don't -- honestly don't recall if that was  
 10 considered sort of commonplace.

11 BY MR. ANAPOL:

12 Q. But would it surprise you if someone  
 13 had that capability before 2002?

14 MR. TONG: Objection --

15 THE WITNESS: It would not surprise  
 16 me --

17 MR. TONG: -- foundation.

18 THE WITNESS: -- no.

19 Oh, sorry.

20 BY MR. ANAPOL:

21 Q. Can you repeat the answer,  
 22 Mr. Rochette.

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1 amount of memory, for example, that a Unix  
 2 application would use. Nothing of that nature  
 3 was done.

4 Yes, the really important thing was  
 5 that an application running in a real-time  
 6 context could preempt anything running in Unix  
 7 and be able to respond immediately.

8 Q. And when the real-time application  
 9 preempts the application in the Unix container,  
 10 the real-time container is taking processing  
 11 resources away from the container at that time?

12 A. Absolutely correct, yes.

13 MR. TONG: Same objections.

14 THE WITNESS: Sorry. I should wait for  
 15 you to object.

16 Yes.

17 BY MR. ANAPOL:

18 Q. By 2002 did software developers in  
 19 Silicon Valley know that servers could monitor  
 20 and log a container's resource usage?

21 MR. TONG: Same objections.

22 THE WITNESS: Yes.

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1 A. It would not surprise me, no.

2 Q. And by 2002 did software developers in  
 3 Silicon Valley know how to move software  
 4 functionality into a shared library?

5 MR. TONG: Objection. Calls for  
 6 speculation. Foundation. Legal conclusion.  
 7 Not venue discovery. Leading.

8 THE WITNESS: Yes.

9 BY MR. ANAPOL:

10 Q. And do you know whether Trigence  
 11 released its container software before or after  
 12 Solaris zones?

13 A. I don't recall whether anything in  
 14 Windows or Linux was released before or after  
 15 zones, no. I don't recall the dates, no.

16 Q. Have you ever heard of Docker?

17 A. Yes.

18 Q. And what is your understanding of  
 19 Docker?

20 A. Docker is a container technology that  
 21 is in wide use today.

22 Q. And when did you first hear about

16 (Pages 61 to 64)



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1 were very -- very abstract to me. The lawyer  
 2 did them, and we had conversations about the  
 3 technology and how it worked. I would --  
 4 BY MR. TONG:  
 5 **Q. Don't --**  
 6 MR. ANAPOL: Don't --  
 7 BY MR. TONG:  
 8 **Q. Don't discuss anything --**  
 9 MR. ANAPOL: Peter -- Peter, you have  
 10 to let him finish his answer.  
 11 MR. TONG: Well, I'm going to tell him  
 12 not to reveal anything privileged.  
 13 **Q. So to the extent you're about to say**  
 14 **anything about your discussions with a lawyer,**  
 15 **don't reveal that. But otherwise, go ahead and**  
 16 **finish answering the question.**  
 17 A. Yeah, in a very -- discussions about  
 18 the claims were always very vague and very  
 19 legal, and I would -- I don't know. I make  
 20 no -- I don't know how to -- I don't know how to  
 21 defend or answer your questions about claims. I  
 22 just don't. I'm not the right guy to do that.

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1 **Q. Yeah, to clarify my question, it's not**  
 2 **whether or not the claims ended up one way or**  
 3 **another. My question was about your intent at**  
 4 **the time.**  
 5 **Would it have been your intent for your**  
 6 **patent to capture the technology as you**  
 7 **understood and described it today?**  
 8 MR. ANAPOL: Same objections --  
 9 THE WITNESS: It was my --  
 10 MR. ANAPOL: -- and relevance.  
 11 THE WITNESS: It was my intent to get  
 12 the description of the invention -- to describe  
 13 it as it worked. That was my intent. It's up  
 14 to the company and the lawyers and so forth to  
 15 nail down the claims. That was not my -- I  
 16 wasn't involved. Not my -- no intent. My  
 17 intent was to be able to describe how the  
 18 invention worked.  
 19 MR. TONG: Okay. Thank you,  
 20 Mr. Rochette.  
 21 Pass the witness. And we should be  
 22 done.

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1 Can you confirm, Jeremy?  
 2 MR. ANAPOL: Yes.  
 3 Thanks again for your time,  
 4 Mr. Rochette.  
 5 MR. TONG: Thank you so much.  
 6 THE WITNESS: Am I free to go?  
 7 MR. ANAPOL: You are free to go.  
 8 MR. TONG: Mr. Rochette -- we can go  
 9 off the record.  
 10 THE VIDEOGRAPHER: Okay. We are going  
 11 off the record. This deposition is concluded at  
 12 2:39.  
 13 (Discussion held off the record.)  
 14 THE REPORTER: Counsel, do you need a  
 15 rough draft of this?  
 16 MR. ANAPOL: Yes, please.  
 17 THE REPORTER: And, Peter, do you need  
 18 a rough?  
 19 MR. TONG: Yes.  
 20 (Whereupon, at 2:44 P.M. CDT  
 21 the deposition of DONN ROCHETTE  
 22 was adjourned.)

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1 STATE OF CALIFORNIA )  
 2 COUNTY OF LOS ANGELES ) SS.  
 3  
 4 I, AUDRA E. CRAMER, CSR No. 9901, in and for the  
 5 State of California, do hereby certify:  
 6 That, prior to being examined, the witness named  
 7 in the foregoing deposition was by me duly sworn to  
 8 testify the truth, the whole truth and nothing but the  
 9 truth;  
 10 That said deposition was taken down by me in  
 11 shorthand at the time and place therein named, and  
 12 thereafter reduced to typewriting under my direction,  
 13 and the same is a true, correct and complete transcript  
 14 of said proceedings;  
 15 I further certify that I am not interested in the  
 16 event of the action.  
 17 Witness my hand this 18 day of September,  
 18 2024.  
 19  
 20  
 21 \_\_\_\_\_  
 22 Certified Shorthand  
 Reporter for the  
 State of California

40 (Pages 157 to 160)



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Donn Rochette

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<p>1 Donn Rochette, c/o Pro se</p> <p>2</p> <p>3</p> <p>Case: VirtaMove Corp. v. Amazon.com, Inc., et al.</p> <p>4 Date of deposition: September 10, 2024 Deponent: Donn Rochette</p> <p>5</p> <p>6 Please be advised that the transcript in the above referenced matter is now complete and ready for signature.</p> <p>7 The deponent may come to this office to sign the transcript, 8 a copy may be purchased for the witness to review and sign, 9 or the deponent and/or counsel may waive the option of 10 signing. Please advise us of the option selected.</p> <p>11 Please forward the errata sheet and the original signed 12 signature page to counsel noticing the deposition, noting the 13 applicable time period allowed for such by the governing 14 Rules of Procedure. If you have any questions, please do 15 not hesitate to call our office at (202)-232-0646.</p> <p>16</p> <p>17</p> <p>18 Sincerely, 19 Digital Evidence Group 20 Copyright 2024 Digital Evidence Group 21 Copying is forbidden, including electronically, absent 22 express written consent.</p>	<p>1 Digital Evidence Group, LLC 2 1730 M Street, NW, Suite 812 3 Washington, D.C. 20036 4 (202)232-0646</p> <p>5</p> <p>6 ERRATA SHEET</p> <p>7</p> <p>8 Case: VirtaMove Corp. v. Amazon.com, Inc., et al. 9 Witness Name: Donn Rochette 10 Deposition Date: September 10, 2024 11 Page No. Line No. Change</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____ 22 Signature Date</p>
<p style="text-align: center;">Page 162</p> <p>1 Digital Evidence Group, L.L.C. 1730 M Street, NW, Suite 812 2 Washington, D.C. 20036 (202) 232-0646</p> <p>3</p> <p>4 SIGNATURE PAGE Case: VirtaMove Corp. v. Amazon.com, Inc., et al. 5 Witness Name: Donn Rochette Deposition Date: September 10, 2024</p> <p>6</p> <p>I do hereby acknowledge that I have read 7 and examined the foregoing pages of the transcript of my deposition and that:</p> <p>8</p> <p>9 (Check appropriate box): ( ) The same is a true, correct and 10 complete transcription of the answers given by me to the questions therein recorded. 11 ( ) Except for the changes noted in the attached Errata Sheet, the same is a true, 12 correct and complete transcription of the 13 answers given by me to the questions therein 14 recorded.</p> <p>15</p> <p>16 _____ 17 DATE WITNESS SIGNATURE</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____ 22 DATE NOTARY</p>	

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